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Phil North/R10/USEPA/US

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To gparker

cc

bcc

Subject Fw: Thoughts for the Bristol Bay discussion tomorrow

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"To protect your rivers, protect your mountains."

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From: Phil North/R10/USEPA/US  
To: Michael Szerlog/R10/USEPA/US@EPA, Richard Parkin/R10/USEPA/US@EPA  
Date: 09/14/2010 11:48 AM  
Subject: Thoughts for the Bristol Bay discussion tomorrow

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Rick and Michael,

I hope that at this point everyone has gotten their minds around the idea that our focus is on the resource and not on any particular project. To that end, here are some thoughts about how I might approach a 404c action. The landscape unit that supports the resource we are discussing is the Bristol Bay watershed. So initially it seems that area should be the target of our 404c action. During the process of developing our proposed determination we would refine our target area based on the need for protection.

Not to be predecisional, but looking ahead, of the six Bristol Bay watersheds all but the Nushagak and Kvichak are mostly federal conservation land (wildlife refuge or national park). Nearly all of the Nushagak and much of the Kvichak are state or private land (including tribal), open for development and with little land use planning that targets protection of aquatic resources. And these two watersheds produce half of Bristol Bay's salmon. So far there are two types of development that have been identified in State of Alaska planning documents that could have significant adverse effects on aquatic resources. The first is what drew our attention here, mining. The second is road building. The State of Alaska has outlined an extensive road system that does not currently exist. If it was constructed as proposed it would cause significant adverse effects.

I think it is important to keep in mind that the loss of aquatic resources we have experienced around the country has been incremental. No one project caused the loss of a fish population. Yet, in spite of nearly 40 years of fairly aggressive water protection, we have many populations of endangered salmon and other aquatic organisms. The poor state of our aquatic resources happened cumulatively, one project at a time. Bristol Bay will be no different. While one large highway project or one mine will cause a significant adverse effect, it probably will not kill the resource. A big project like Pebble would be a big blow by itself (not to mention seven more Pebbles), but it is the accumulation of mines and highways, and all the associated residential and commercial development enabled by the larger scale developments, that will ultimately cause the demise of the resources we are targeting.

So a 404c that targets the primary habitat of the resource we are trying to protect, salmon, is a logical approach. First at the specific habitat level by prohibiting discharge in stream channels and the riparian (or adjacent) wetlands that most directly support them. Second by initially addressing Bristol Bay as a

whole then narrowing to those watersheds that are at risk.

I thought these might be useful ideas if you get into the weeds tomorrow.

Phil

PS - Michael, my computer system is still not 100%, my phone is not able to play back phone messages. But I saw that you called.

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